

AQ 81- (Rev. 11/11) Criminal Complaint
 United States District Court
 Southern District of Texas
 FILED

MAY 06 2020

UNITED STATES DISTRICT COURT

for the

David J. Bradley, Clerk

Southern District of Texas

United States of America

v.

 Irvin Gabriel IGLESIAS
 YOB: 1988 USC

Case No. M-20-0943-M

 Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 05, 2020 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 USC 922(a)(6)

Title 2(a)

It shall be unlawful for any person in connection with the acquisition or attempted acquisition of any firearm or ammunition from a licensed dealer knowingly to make any false or fictitious oral or written statement intended or likely to deceive such dealer with respect to any fact material to the lawfulness of the sale.

Whoever commits an offense against the United States or aids, abets

This criminal complaint is based on these facts:

See Attachment A

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on: 5/6/2020 @ 11:24 a.m.

☒ Continued on the attached sheet.

Approved by AUSA Robert Guerra

/s/ Candace Garza

Complainant's signature

Candace Garza, ATF Special Agent

Printed name and title

~~Sworn to before me and signed in my presence.~~

Date: _____



Judge's signature

City and state: McAllen, TX

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

This affidavit is in support of a criminal complaint charging Irvin IGLESIAS, hereinafter referred to as "IGLESIAS", with the criminal violation set forth in Attachment A. The evidence available to me demonstrates that there is probable cause that IGLESIAS violated Title 18 U.S.C. Section 922(a)(6) and 2(a) which provide as follows:

It shall be unlawful for any person in connection with the acquisition or attempted acquisition of any firearm or ammunition from a licensed dealer knowingly to make any false or fictitious oral or written statement intended or likely to deceive such dealer with respect to any fact material to the lawfulness of the sale or other disposition of such firearm or ammunition under the provisions of this chapter.

Whoever commits an offense against the United States or aids, abets, counsels, commands, induces or procures its commission, is punishable as a principal.

Further, the Affiant states as follows:

On May 05, 2020, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Special Agents were conducting a surveillance operation at a Federal Firearms Licensee (FFL) located in Mission, TX. Agents observed an individual exit the store with two (2) rifle boxes and place the boxes inside a vehicle parked outside the store. Shortly thereafter, Agents observed Irvin IGLESIAS later enter this vehicle. Agents then approached the vehicle and made contact with IGLESIAS prior to IGELSIAS' departure from the location. IGLESIAS was subsequently detained.

During a post-Miranda interview, IGLESIAS admitted to strawpurchasing firearms.

IGLESIAS admitted that he knew the individual Agents saw carrying the rifle boxes out of the store. IGLESIAS admitted he recruited that individual to purchase firearms for him that day. IGLESIAS stated that individual was paid by IGLESIAS to straw purchase two (2) Rock River Arms, model LAR-15, 5.56 caliber rifles from the FFL. IGLESIAS admitted that he knew that the individual would be knowingly making a false and fictitious statement which was intended or likely to deceive the FFL dealer with respect to a material fact to the lawfulness of the sale of the firearms, namely that the individual recruited by IGLESIAS was the actual buyer of the firearms when in truth and in fact IGLESIAS was the actual buyer.

IGLESIAS admitted that he provided the individual with money to straw purchase the aforementioned firearms. Additionally, IGLESIAS stated he paid the individual \$100 for each firearm the individual straw purchased on IGLESIAS' behalf. IGLESIAS agreed that the ATF Form 4473 was falsified by the individual because the firearms were for IGLESIAS and not the individual.